

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

V.

CAUSE NO: 4:23-CR-9-TWP-VTW

PEDRO VELASQUEZ

DEFENDANT

Electronically Filed

DEFENDANT'S UNOPPOSED MOTION TO CONTINUE TRIAL DATE

***** ***** *****

Comes the Defendant, PEDRO VELASQUEZ, by his appointed counsel, and moves this Court to continue the trial date in the above-styled action. As grounds, the Defendant states as follows:

1. That the above-named Defendant is charged with Unlawful Re-entry of an Alien Previously Removed or Deported from the United States, as proscribed by 8 U.S.C. Section 1326(a) and (b) [DN 15].

2. On August 10, 2023, the undersigned informed the Court and counsel for the United States that the Defendant wanted to enter a plea of guilty to the charge in the indictment without a Plea Agreement [DN 29]. However, it will not be possible to file a Petition to Enter a Guilty Plea that is executed by the Defendant before the date that pretrial filings are due.

4. Counsel for the United States has authorized the undersigned to inform the Court that there is no opposition to this Motion to Continue the Trial Date.

3. Therefore, the Defendant, PEDRO VELASQUEZ, requests this Court to continue the

trial date of September 18, 2023.

Respectfully submitted,

s/LARRY D. SIMON

LARRY D. SIMON

Attorney for Defendant

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CERTIFICATION

I hereby certify that on August 14, 2023, a copy of the foregoing Motion to Continue the Trial Date was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the court's electronic filing system. Parties may access this filing through the court's system.

s/LARRY D. SIMON

LARRY D. SIMON